

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

JANET BAKER and JAMES BAKER,
JKBAKER LLC and JMBAKER LLC,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING
CORP., S.A.)

Defendants.

Civil Action No.: 04-10501 (PBS)

GARY B. FILLER and LAWRENCE
PERLMAN, Trustees of the TRA Rights
Trust,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING
CORP., S.A.)

Defendants.

Civil Action No.: 04-10477 (PBS)

STONINGTON PARTNERS, INC., a
Delaware Corporation, STONINGTON
CAPITAL APPRECIATION 1994 FUND
L.P., a Delaware Partnership and
STONINGTON HOLDINGS, L.L.C., a
Delaware limited liability company,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING
CORP., S.A.)

Defendants.

Civil Action No.: 04-10411 (PBS)

DECLARATION OF THOMAS TEIGE CARROLL

I, Thomas Teige Carroll, declare and state as follows:

1. I am an associate at Clifford Chance US LLP, counsel for Defendant Dexia Bank Belgium ("Dexia"). I submit this Declaration in further support of Dexia's Motion for Judgment on the Pleadings.
2. Attached hereto as Exhibit A is a true and correct copy of the first Complaint filed by Gary B. Filler and Lawrence Perlman, Trustees of the TRA Rights Trust, against Hanvit Bank, Shinhan Bank, and Chohung Bank, dated October 29, 2001. *Filler v. Hanvit*, 01-CV-8510 (MGC) (S.D.N.Y. Oct. 29, 2001).
3. Attached hereto as Exhibit B is a true and correct copy of the Second Amended Complaint filed by Gary B. Filler and Lawrence Perlman, Trustees of the TRA Rights Trust, against Hanvit Bank, Shinhan Bank, and Chohung Bank, dated March 31, 2003. *Filler v. Hanvit*, 01-CV-8510 (MGC) (S.D.N.Y. March 31, 2003) (page 36 was not copied inadvertently).
4. Attached hereto as Exhibit C is a true and correct copy of *Filler v. Hanvit*, 247 F. Supp. 2d 425 (S.D.N.Y. 2003).
5. Attached hereto as Exhibit D is a true and correct copy of *Filler v. Hanvit*, Nos. 01 Civ. 9510 (MGC), 02 Civ. 8251 (MGC), 2003 WL 22110773 (S.D.N.Y. Sept. 12, 2003).
6. Attached hereto as Exhibit E is a true and correct copy of *Filler v. Hanvit*, 339 F. Supp. 2d 553 (S.D.N.Y. 2004).

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
June 22, 2006



Thomas Teige Carroll